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BDAC water TRansfers Group

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I recommend some word changes in the Water Transfer Element. Some terms need definition or qualification and some statements imply social judgements that I believe are inappropriate.

- 1) On page 2 above the bullets it should refer to water made available through "conservation of water otherwise lost to beneficial use" and "reservoir re-operation that increases the water supply available for beneficial use".
- 2) Regarding the first bullet on page 3, water transfers don't create water, they, therefore, can only reallocate water from what is deemed a less urgent use to a more critical use. The claim that this constitutes a reduction in the demand/supply mismatch is a value judgement.
- 3) The last sentence above 1.2 should read "However, a facilitated water market will probably result in some level of water reallocation to uses that are associated with higher dollar income per unit of water use." They do not necessarily have higher social value.
- 4) The first sentence in 1.2 should read "One potential source for transferable water is water which is stored in surface or subsurface storage facilities and which would not be beneficially used for mandated streamflow or by existing legal water users in the absence of the transfer".
- 5) The first line of the following paragraph should read "However, water transfers do not substantially substitute for needed increases in new water supply-----".
- 6) The third sentence after "First" on page 4 should read "Above all, water rights of sellers and other legal users of water must not be impaired".

- 7) The sentence after "1" at the top of page 7 should be expanded to add "and in compliance with existing law including the no injury rule."
- 8) Item 5 on page 7 should be revised per the conversation at our last meeting to distinguish between avoiding injury to other legal water users, and avoiding or mitigating where possible adverse impacts to other third parties.
- 9) In the third line under 2.2-2 strike the word "even".
Keep up the good work.